

memorandum

DATE: September 3, 2003

REPLY TO
ATTN OF: Office of Air, Water and Radiation Protection Policy and Guidance:(EH-41):Wallo:6-4996

SUBJECT: Department of Energy (DOE) Response to the Inspector General's Recommendations on Groundwater Monitoring Programs at DOE Sites

TO: Distribution

In February 2000, the Inspector General (IG) issued an audit report entitled "Groundwater Monitoring Activities at Department of Energy Facilities" (DOE/IG-0461). The report found that DOE's groundwater monitoring activities could be conducted more cost effectively through better site-wide integration and adoption of innovative technologies. The report recommended that field office managers give priority attention to integrating all groundwater monitoring activities at each DOE site and that innovative technologies and laboratory analytical services be continually re-evaluated for cost effectiveness. The IG also recommended that a single headquarters office be responsible and accountable for groundwater monitoring activities, and be given the responsibility for gathering information on best monitoring practices, program costs, and monitoring results. The IG recommended that this office also be responsible for communicating best practices to the field, and for assisting the field by performing technical peer reviews and by expediting integration of groundwater monitoring programs at each site.

In responding to the IG report, the Department agreed with the IG's recommendation for greater headquarters involvement, but indicated that various headquarters and field organizations have had specific responsibilities for groundwater monitoring programs, and are, therefore, accountable for their cost effectiveness. The Department, however, acknowledged that the effort to improve the quality and consistency of groundwater monitoring should be coordinated through the Office of Environment, Safety and Health (EH) with the support of relevant program and field offices.

The Department has made considerable progress with regard to implementing these recommendations, including the issuance of Order DOE 450.1, *Environmental Protection Program*, which requires a management systems approach to integration of groundwater protection and monitoring. In order to fully satisfy DOE's commitments for improving the quality of groundwater monitoring programs, and to reach closure on the IG's recommendations, EH has committed to complete the following actions:

- Prepare implementation guidance on groundwater monitoring, corresponding to Order DOE 450.1 requirements;
- Continue to sponsor the DOE Groundwater Protection Work Group to effectively

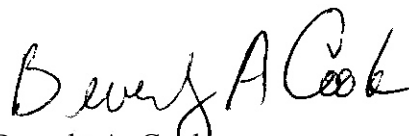
- communicate best practices throughout the Department;
- Sponsor technical peer reviews, as requested by line management, to assist in groundwater monitoring program integration and optimization;
- Accumulate and disseminate information on how DOE site groundwater programs have demonstrated cost effective practices;
- Prepare an annual report on groundwater monitoring programs for internal DOE management use;
- Expand the Office of Air, Water and Radiation Protection Policy and Guidance (EH-41) Web Site to include a focus area for information on cost-effective approaches to groundwater monitoring at DOE sites.

Some of the IG's recommendations, however, are inherently program and field office responsibilities. To assure DOE responsiveness to the IG, DOE program and field offices should continue to be accountable for:

- Integrating groundwater monitoring program activities across each site, consistent with the environmental management systems requirements of Order DOE 450.1;
- Regularly evaluating innovative technologies for groundwater monitoring, and implementing those that improve the quality and value of monitoring data and its cost effectiveness; and
- Evaluating the provisions of laboratory service contracts to assure greater cost effectiveness.

My staff plans to work cooperatively with program offices and field offices by providing additional guidance, analytical tools, and opportunities for exchange of technical information and experience in groundwater monitoring program optimization. I have instructed EH-41 to document improvements in the quality of groundwater monitoring data and in program cost effectiveness and to share lessons learned throughout the Department. I request that you support this effort by encouraging your technical staff to provide information that demonstrates improvements in the groundwater monitoring program at the sites for which you are responsible, and to participate in EH-sponsored activities aimed at improving Department-wide groundwater monitoring.

If you have any suggestions on how EH can work effectively with your organization to achieve the goals outlined above, please contact James Bachmaier at james.bachmaier@eh.doe.gov or at 202-586-0341.



Beverly A. Cook
Assistant Secretary
Environment, Safety and Health

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